



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

AAS/RMP/AS/ADR  
F. #2021R00600

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October 28, 2025

By Email and ECF

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Re: United States v. Sun, et. al.  
Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

This letter will be accompanied by a link to the secure download of certain discovery materials produced pursuant to Rule 16 of the Federal Rules of Criminal Procedure. The government renews its request for reciprocal discovery from the defendants.

The following documents were recently obtained by the government during the course of the investigation or recently authorized for production:

<b>Bates No.</b>	<b>Description of Item</b>
EDNY_152899	Records from New York State Executive Chamber
EDNY_152900-EDNY_152906	Records from Adam Baruch
EDNY_152907-EDNY_152964	Attachment to Agent Reports

Bates No.	Description of Item
EDNY_152965-EDNY_153141	Replacement translation for the document previously produced at EDNY_143500-EDNY_143705, which corrects unreadable transcription errors in the translation.
EDNY_000108, EDNY_000170, EDNY_000495, EDNY_000497, EDNY_000694, EDNY_000717, EDNY_000722, EDNY_000724, EDNY_000726, EDNY_001510, EDNY_001730, EDNY_001731, EDNY_001735, EDNY_001736, EDNY_001752, EDNY_001763, EDNY_001765, EDNY_001768, EDNY_001770, EDNY_001854, EDNY_002524, EDNY_002629, EDNY_002699, EDNY_002868, EDNY_002930, EDNY_003131, EDNY_003515, EDNY_003886, EDNY_003897, EDNY_003933, EDNY_003938, EDNY_003971, EDNY_004005, EDNY_004041, EDNY_004109, EDNY_004196, EDNY_004229, EDNY_004381, EDNY_004383, EDNY_004447, EDNY_004451, EDNY_004470, EDNY_004471, EDNY_005269, EDNY_005275, EDNY_005284, EDNY_005313, EDNY_005322, EDNY_005343, EDNY_005390, EDNY_005433, EDNY_005545, EDNY_005549, EDNY_005601, EDNY_005690, EDNY_006100, EDNY_006273, EDNY_006410, EDNY_006516, EDNY_006521, EDNY_007654	Reproduction of documents from Executive Chamber for which only placeholder documents were previously produced as part of the September 24, 2024 production

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling us to arrange a mutually convenient time.

Very truly yours,

JOSEPH NOCELLA, JR.  
United States Attorney  
Eastern District of New York

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